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July 8, 2020

Via ECF

The Honorable Judge Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 701
New York, New York 10007

MEMORANDUM ENDORSED. the
conference currently scheduled for July 14,
2020 is ADJOURNED and will be held instead
on July 31, 2020 at 11:30 a.m. SO ORDERED.
7/10/2020

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Re: *Ralph Sanzari, et al. v. Metro-North Railroad Company*
19-CV-8689 (Liman, J.) (Aaron, M.J.)

LETTER-MOTION TO ADJOURN 7/14/20 CONFERENCE

Our File No. 4421.004

Dear Judge Liman:

The law firm of Holm & O'Hara LLP represents the Plaintiff Association of Commuter Rail Employees, Division 1 in this action. Your Honor's May 19, 2020 Order directed counsels for Plaintiff and Defendant, Metro-North Railroad Company ("Metro-North"), to appear for an Initial Pretrial Conference on July 14, 2020 at 11:00 a.m.

We write, in accordance with Your Honor's Individual Practices in Civil Cases, Rule 1(C), and with the consent of counsel for Metro-North, Neil H. Abramson, Esq., to respectfully request an adjournment of the July 14, 2020 Initial Pretrial Conference. The reason for this request is that I had an unexpected and very tragic death occur and will be attending funeral services out-of-state on July 14, 2020. This is Plaintiff's first request to adjourn this conference, although Plaintiff consented to three previous requests for adjournment of this conference which were granted.

Counsels have conferred and respectfully propose the following alternative dates for an Initial Pretrial Conference before Your Honor:

- Tuesday, July 21, 2020;
- Wednesday, July 22, 2020 before 12:00 p.m.;
- Monday, July 27, 2020;
- Wednesday, July 29, 2020 after 1:00 p.m.; or
- Friday, July 31, 2020.

Hon. Lewis J. Liman, U.S.D.J.

July 8, 2020

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Thank you for your consideration of the foregoing.

Respectfully,

HOLM & O'HARA LLP

Attorneys for Plaintiff

/s/ Carol G. Dell

Carol G. Dell, Esq.

CGD/kmm

cc: Neil H. Abramson, Esq. (via ECF)
Erin P. Conroy, Esq. (via ECF)
Ed Valente (via email)